

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

RACHEL GUNTER, individually and on)
Behalf of all other similarly situated,)
)
)
Plaintiff,) Case No. 1:23-cv-00937-JKB
)
)
v.) CLASS ACTION COMPLAINT
)
DELL TECHNOLOGIES INC.,) JURY TRIAL DEMANDED
)
)
Defendant.)

**CONSENT MOTION TO EXTEND RESPONSIVE PLEADING
AND RELATED BRIEFING DEADLINES**

Defendant Dell Technologies Inc. ("Dell"), with the consent of Plaintiff Rachel Gunter ("Plaintiff"), hereby moves for an extension of time in which to file its responsive pleading and related briefing deadlines and for cause states:

1. Dell was served with Plaintiff's Class Action Complaint on April 26, 2023, making its responsive pleading due on or before May 17, 2023.
2. After reviewing the allegations in the complaint and conducting an initial investigation of Plaintiff's claims therein, Dell determined that it will move to compel arbitration and dismiss Plaintiff's claims based on the ground that Plaintiff's claims are subject to a mandatory individual arbitration provision. Plaintiff intends to oppose this motion.
3. Dell needs additional time to further investigate and evaluate Plaintiff's claims before otherwise responding to Plaintiff's complaint.
4. Accordingly, Dell requests a thirty (30) day extension, until June 16, 2023, to file its motion to compel arbitration and any further responsive pleading.
5. Dell further requests that the briefing schedule for its motion to compel arbitration and any further motion to dismiss Plaintiff's claims be extended to allow Plaintiff thirty (30) days

*Granted
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until July 17, 2023, to file any opposition to that motion and allow Dell thirty (30) days until August 16, 2023, to file any reply in support of that motion.

6. Plaintiff consents to this motion.

WHEREFORE, Defendant Dell Technologies Inc. respectfully requests this Court grant an extension of time to file its responsive pleading and extend the briefing schedule for its motion to compel arbitration and any further motion to dismiss as follows:

- Dell's responsive pleading deadline is extended to June 16, 2023.
- Plaintiff's deadline to file any opposition to Dell's motion to compel arbitration and any further motion to dismiss is extended to July 17, 2023.
- Dell's deadline to file any reply in support of its motion to compel arbitration any further motion to dismiss is extended to August 16, 2023.

Dated: May 9, 2023

/s/ James P. Ulwick

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**ATTORNEYS FOR DEFENDANT
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CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of May, 2023, the foregoing **CONSENT MOTION TO EXTEND RESPONSIVE PLEADING AND RELATED BRIEFING DEADLINES** was electronically filed and served on all counsel of record through the Court's CM/ECF system.

/s/ Michelle Noorani

Michelle Noorani (#26438)